

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

STEVE HICKMAN,	:	
	:	
Plaintiff,	:	CONSOLIDATED
	:	Civil Action No. 05-811-KAJ
v.	:	
	:	
DETECTIVE MARZEC, in his	:	
individual and official capacity,	:	
DAVID HUME IV, TOWN OF	:	
DELMAR, DEPARTMENT	:	
OF DRUG ENFORCEMENT,	:	
and AGENT TOM JACOBS,	:	
	:	
Defendants.	:	

DEFENDANTS' RESPONSE TO PLAINTIFFS' REQUEST FOR ADMISSIONS

Defendants Detective Marzec, Agent Tom Jacobs, and Agent Chris Quaglino submit the following responses to Plaintiffs' Request For Admissions:

1. Objection to Request No. 1 as vague. Subject to that objection, Defendants deny Request No. 1, and respond further that Plaintiffs Steve Hickman's and Tawanda Weatherspoon's residence at 9008 Greentop Road in Lincoln, Delaware was searched on September 21, 2005 pursuant to a search warrant that described a premise located at 9008 Greentop Road, on the west side of Greentop Road, in Ellendale, Sussex County, Delaware, which was a "trailer [that] is beige/tan with white trim, a white foundation, white front door with the numbers '9008' to the right side of the front door."

2. Objection to Request No. 2 as vague. Subject to that objection, Defendants deny Request No. 2, and respond further that the residence at 9008 Greentop Road in Lincoln,

Delaware that was searched on September 21, 2005 pursuant to a search warrant was a trailer that was beige/tan with white trim as stated in the search warrant, and that the search warrant described the property to be searched and seized.

3. Objection to Request No. 3 as vague. Subject to that objection, Defendants deny Request No. 3, and respond further that Sandra White was not suspected of committing any crimes on September 21, 2005, but that Tawanda Weatherspoon was known as Steve Hickman's girlfriend and she was suspected of attempting to hide assets for Steve Hickman by registering the Dodge Durango seized from Steve Hickman.

a. Objection to Request No. 3(a) as vague. Subject to that objection, Defendants deny Request No. 3(a), and respond further that Tawanda Weatherspoon was contacted at the residence. She was not searched. Tawanda Weatherspoon was asked to remove the children from the residence. Tawanda Weatherspoon exited the residence and remained outside during the search of the residence. Tawanda Weatherspoon re-entered the residence to gather items for the children and re-exited the residence.

4. Objection to Request No. 4 as vague. Subject to that objection, Defendants deny Request No. 4, and respond further that the search warrant described a trailer in a trailer park south of Ellendale that was utilized as a packaging/sale house.

5. Objection to Request No. 5 as vague. Subject to that objection, Defendants admit Request No. 4 in part, and respond further that there were additional facts that supported the probable cause for the search warrant.

6. Objection to Request No. 6 as vague. Subject to that objection, Defendants deny Request No. 6, and respond further that no drug transactions were observed at the Greentop Road

residence, although information received by law enforcement identified the Greentop Road residence as a distribution location for Steve Hickman. No drugs were recovered at the time of search warrant execution.

COLM F. CONNOLLY
United States Attorney

By: /s/ Seth M. Beausang
Seth M. Beausang (I.D. No. #4071)
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Dated: May 9, 2007.

CERTIFICATE OF SERVICE

I, Seth M. Beausang, hereby attest under penalty of perjury that on this 9th day of May, 2007, I caused two copies of the Defendants' Response to Plaintiffs' Request for Admissions to be served on the pro se Plaintiffs by First Class Mail at the following address:

Steve A. Hickman
Tawanda Weatherspoon
Sandra White
9008 Greentop Rd.
Lincoln, DE 19960

and counsel for the Town of Delmar by First Class Mail at the following address:

Daniel A. Griffith, Esq.
1220 Market Street, 5th Floor
Wilmington, DE. 19801

/s/ Seth M. Beausang
Seth M. Beausang (DE I.D. No. 4071)